

Marc E. Elias (D.C. Bar No. 442007)
(*Pro hac vice*)
Jacki L. Anderson (Ill. Bar No. 6312256)
(*Pro hac vice*)
PERKINS COIE LLP
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: 202.654.6200
Facsimile: 202.654.6211
Email: MElias@perkinscoie.com
JackiAnderson@perkinscoie.com

Sambo Dul (Ariz. Bar No. 030313)
(*Pro hac vice*)
PERKINS COIE LLP
2901 N. Central Avenue, Suite 2000
Phoenix, Arizona 85012
Telephone: 602.351.8000
Facsimile: 602.648.7000
Email: SDul@perkinscoie.com

Bradley Schrager (Nev. Bar No. 10217)
Daniel Bravo (Nev. Bar No. 13078)
WOLF RIFKIN SHAPIRO SCHULMAN & RABKIN, LLP
3556 East Russell Road, Second Floor
Las Vegas, Nevada 89120
Telephone: 702.341.5200
Facsimile: 702.341.5300
Email: BSchrager@wrslawyers.com
DBravo@wrslawyers.com

*Attorneys for Plaintiffs Nora Luna, Bilal Shabazz,
Diane Crump-Richmond, Susan Florian, and Demi
Falcon*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NORA LUNA; BILAL SHABAZZ; DIANE
CRUMP-RICHMOND; SUSAN FLORIAN;
and DEMI FALCON,

Plaintiffs,

v.

BARBARA CEGAVSKE, in her official
capacity as the Nevada Secretary of State; and
JOSEPH GLORIA, in his official capacity as
the Clark County Registrar of Voters,

Defendants.

No. 2:17-cv-02666-JCM-CWH

**MOTION TO CONFIRM
DISASSOCIATION AND
WITHDRAWAL OF COUNSEL
SAMBO DUL**

1 Plaintiffs, NORA LUNA, BILAL SHABAZZ, DIANE CRUMP-RICHMOND, SUSAN
2 FLORIAN, and DEMI FALCON (collectively, “Plaintiffs”), hereby move the Court for entry of
3 an order removing Sambo Dul, Esq. from the case as attorney of record for Plaintiffs and from
4 all service lists. Effective January 25, 2019, Sambo Dul, Esq. is no longer affiliated with Perkins
5 Coie LLP. Because Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP and Perkins Coie LLP still
6 represent Plaintiffs as lead counsel, no parties are prejudiced by the withdrawal of Sambo Dul,
7 Esq.

8 In support of this motion, Plaintiffs state the following:

9 1. On November 3, 2017, Plaintiffs filed Sambo Dul’s Verified Petition to Practice
10 Pro Hac Vice. *See* ECF No. 16.

11 2. On November 6, 2017, this Court granted Sambo Dul’s Verified Petition to
12 Practice Pro Hac Vice. *See* ECF No. 19.

13 3. Local Rule IA 11-6(b) provides, “No attorney may withdraw after appearing in a
14 case except by leave of the court after notice has been served on the affected client and opposing
15 counsel.”

16 4. Plaintiffs have received notice of Ms. Dul’s intent to withdraw from this case.
17 Opposing counsel will receive notice of this motion via the CM/ECF system.

18 5. Local Rule IA 11-6(e) provides, “[N]o withdrawal or substitution will be
19 approved if it will result in delay of discovery, the trial, or any hearing in the case.”

20 6. No delay of any kind will result from Ms. Dul’s withdrawal because Wolf, Rifkin,
21 Shapiro, Schulman & Rabkin, LLP and Perkins Coie LLP, and their counsel who have
22 previously appeared in this proceeding, still represent Plaintiffs as lead counsel.

23 ///

24 ///

25 ///

26 ///

27 ///

1 For these reasons, Plaintiffs respectfully move this Court for an order removing Sambo
2 Dul, Esq. from the case as attorney of record for Plaintiffs and from all service lists.

3
4 Respectfully submitted,

5 Dated: January 17, 2019.

WOLF RIFKIN SHAPIRO SCHULMAN & RABKIN, LLP

6 By: /s/ Bradley Schrager

7 Bradley Schrager, Esq.
8 Daniel Bravo, Esq.
3556 East Russell Road, Second Floor
Las Vegas, Nevada 89120

9 Marc E. Elias, Esq.
10 Jacki L. Anderson, Esq.
PERKINS COIE LLP
11 700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960

12 Sambo Dul, Esq.
PERKINS COIE LLP
13 2901 N. Central Avenue, Suite 2000
14 Phoenix, Arizona 85012

15 *Attorneys for Plaintiffs Nora Luna, Bilal Shabazz, Diane*
16 *Crump-Richmond, Susan Florian, and Demi Falcon*

17
18 **IT IS SO ORDERED.**

19 
20 United States Magistrate Judge

21 DATED: 1/18/2019
22
23
24
25
26
27
28